

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

VISHVA DESAI and PHILIP J. CHARVAT, on behalf of themselves and others similarly situated,

Plaintiffs,

vs.

ADT SECURITY SERVICES, INC..

Defendant.

Judge Bucklo

Magistrate Judge Keys

Case No. 1:11-cv-1925

PLAINTIFFS' MOTION TO EXTEND TIME TO RESPOND TO DISCOVERY

Plaintiffs respectfully request that the Court extend the time within which plaintiffs may respond to ADT's first discovery requests by 45 days. In support of this motion, plaintiffs state:

1. This is a Telephone Consumer Protection Act, 47 U.S.C. §227(b) class action. ADT served discovery requests upon plaintiffs on or about August 11, 2011. Plaintiffs have been working diligently to compile responses to these requests, but have not been able to complete the responses by September 12, 2011.
2. Plaintiffs believe that an additional 45 days will provide sufficient time within which to provide complete responses, and request that the Court allow such.
3. Plaintiff's counsel Alexander H. Burke called and sent defense counsel Michael Baughman an email asking if ADT agrees to this extension on September 12, 2011, but ADT has not yet responded.
4. Plaintiffs believe that ADT is likely to agree to this extension, but file this motion out of an excess of caution because they have not heard back.

5. Plaintiffs will respectfully withdraw this motion without prejudice if they can come to some agreement with ADT prior to its presentment.

WHEREFORE, plaintiffs respectfully request that this Court extend the time within which they may respond to ADT's first discovery requests by 45 days.

/s/Alexander H. Burke
Counsel for Plaintiffs

Alexander H. Burke

BURKE LAW OFFICES, LLC

155 N. Michigan Ave., Suite 9020
Chicago, IL 60601
(312) 729-5288
(312) 729-5289 (fax)
ABurke@BurkeLawLLC.com